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# WORK ASSIGNMENT PERFORMANCE WORK STATEMENT

Contract No. EP-C-10-060 Work Assignment: 0-15

WAM: Name: Michella Karapondo

**Branch: Technical Support Center** 

Standards and Risk Management Division/Office of Water

Phone: (513) 569-7141

FAX: (513) 569-7191

Email: karapondo.michella@epa.gov

Mail code: MS-140 26 W. Martin Luther King Dr. Cincinnati, OH 45268

Alternate WAM: Steve Wendelken

Phone: (513) 569-7491

Email: wendelken.steve@epa.gov

**LOE: 1890 hours** 

Period of Performance: November 1, 2010 to July 31, 2011

Title: Radiochemistry Laboratory Audit Support

**PWS Sections: 3.1.4** 

## I. PURPOSE:

The purpose of this work assignment is to provide technical assistance needed by Office of Water, Office of Ground Water and Drinking Water, Technical Support Center, Laboratory Certification Program to evaluate the capability of selected laboratories analyzing samples for radiochemical contaminants in drinking water and provide recommendations about the drinking water certification status of these laboratories to the appropriate State and Regional Certification Officers. To achieve this purpose the contractor shall be expected to conduct on-site audits and data audits of laboratories performing radiochemical analyses of drinking water compliance monitoring samples, and provide recommendations in reports and checklists to EPA and the appropriate State and Regional Certification Officers. This project supports programmatic support needs related to our national all hazards homeland security responsibilities by ensuring

technical capability of laboratories analyzing drinking water samples for radiochemical contaminants.

#### II. BACKGROUND:

The National Primary Drinking Water Regulations require public water systems to monitor for certain radiological contaminants, as per 40 CFR 141.26. To ensure data quality, as well as to fulfill requirements of 40 CFR 141.28, drinking water compliance samples must be analyzed by laboratories certified by the State or EPA, using promulgated methods found in 40 CFR 141.25 or their equivalent, as determined by EPA in accordance with 40 CFR 141.27, for analyzing samples for radiochemical contamination. The Office of Ground Water and Drinking Water, Technical Support Center, Laboratory Certification Program oversees the certification of laboratories analyzing samples for drinking water compliance monitoring. EPA Regions are responsible for determining the certification status for the state principal laboratory system in each primacy state within the Region. One of the requirements for state primary enforcement responsibility ("primacy") under 40 CFR 142.10 is that states must have "laboratory facilities certified by the Administrator (EPA) and capable of performing analytical measurements of all contaminants specified in the State primary drinking water regulations." Typically, EPA personnel from each Region have responsibility for conducting periodic laboratory audits of the state facilities to ensure laboratory capability and to grant certification to those laboratories. However, at this time, most EPA Regions lack the expertise to perform audits of laboratories performing radiochemical analysis of drinking water compliance monitoring samples. Effort provided by the contractor through this work assignment will provide EPA with technical expertise to conduct audits of radiochemistry laboratories and provide technical assistance to EPA to allow EPA to determine if those laboratories should be granted drinking water certification for the radiochemical analytical methods.

### **IIII. QA REQUIREMENTS:**

The tasks in this work assignment require the use of secondary data. Consistent with the Agency's quality assurance (QA) requirements, the contractor must prepare a complete Project Specific Quality Assurance Project Plan (QAPP) to assure the quality of the secondary data used under this work assignment. Work on these tasks cannot proceed until the contractor receives notification of QAPP approval from the PO via e-mail. The project specific quality assurance requirements must be addressed in the work plan and monthly progress reports as specified under Task 0, below.

#### IV. DETAILED TASK DESCRIPTION:

All direction under this work assignment will be provided as written technical direction from the Task Manager or Work Assignment Manager, as appropriate. If provided first as verbal technical direction to the contractor, it will be confirmed in writing within 5 calendar days, with a copy to the Project Officer and the Contracting Officer, and is subject to the limitations of Contract Clause H.21. Each initial deliverable shall be provided to the EPA Work Assignment Manager (WAM) and EPA Project Officer (PO) in draft form for review and comment. The contractor shall incorporate WAM/Task Manager review comments into revisions of the drafts.

All drafts and final reports shall be approved by the WAM.

The contractor shall perform the following tasks:

### Task 0: Work Plan, Progress Evaluations, and Monthly Progress Reports

The contractor shall develop a work plan that describes how each task will be carried out. The work plan shall include a schedule, staffing plan, level of effort (LOE), and cost estimate for each task, the contractor's key assumptions on which staffing plan and budget are based, and qualifications of proposed staff. If a subcontractor(s) is proposed and subcontractors are outside the metropolitan DC area, the contractor shall include information on plans to manage work and contract costs. The work plan shall also provide an analysis of the existing and projected constraints, and the feasibility of accomplishing the project's purpose.

In addition, the contractor shall prepare a Quality Assurance Project Plan (QAPP) (noted above), and ensure the quality of secondary data used to complete these tasks. The work plan shall explain when the QAPP will be submitted based on the specific data requirements of the WA. This task also includes monthly progress and financial reports. The monthly progress report shall indicate, in a separate QA section, whether significant QA issues have been identified and how they are being resolved. Monthly financial reports must include a table with the invoice LOE and costs` broken out by the tasks in this WA.

In addition, in each monthly progress report, the contractor shall, at the introduction to the discussion of this work assignment, discuss actual progress toward achieving the purpose of this work assignment, including problems encountered, issues that may need to be resolved, and anticipated timing for completing the goals of the work assignment. The contractor shall provide an overview of contract projects, striving to implement efficiencies in performance when complimentary requirements are issued. The contractor shall assure that duplication of effort relative to other ongoing work assignments under this contract is not occurring

<u>Deliverables</u>: Work plan, project specific QAPP and monthly progress and financial reports.

### Task 1: Audits of Radiochemistry Laboratories

The contractor shall assess the facilities, equipment, and scientific expertise of state principal laboratories which analyze samples for radiochemical contaminants in drinking water and determine compliance with the requirements of Chapters 1, 2, 3, and 6 of the *Manual for the Certification of Laboratories Analyzing Drinking Water*, the radiochemistry drinking water methods in 40 CFR 141.25 and Appendix A to Subpart C of 141 as well as Alternate Test Procedure radiochemistry methods approved by OGWDW for drinking water. As directed by the EPA WAM or designated Task Manager, the contractor shall perform on-site audits of up to twelve radiochemical laboratories, including but not limited to laboratories acting as the state principal laboratories of Alabama, Colorado, Kentucky, Maine, New Jersey, New Mexico, North

Carolina, Utah, and Vermont and two commercial laboratories in Wyoming: Energy Laboratories and Inter-Mountain Laboratories. Audits of the two commercial laboratories in Wyoming are necessary as drinking water primacy for Wyoming is under the responsibility of the Region 8 certification program. If a laboratory acting as a state principal laboratory has been granted drinking water certification by a recognized state certification program, the contractor shall first assess documentation supporting that drinking water certification decision, including Laboratory Quality Assurance Plans/Manuals, Standard Operating Procedures, Proficiency Testing results and supporting data, and other related materials to determine if the certification decision meets the aforementioned requirements. If the supporting documentation does not meet the requirements of the drinking water certification program, the contractor may perform an onsite audit of the lab as directed by the EPA WAM. The listing of laboratories is subject to change due to scheduling and resources. In performing these audits, the contractor shall make it clear to all laboratory staff that they are working as a contractor to the Environmental Protection Agency. The contractor also shall indicate that all questions of policy must be directed to EPA since the contractor cannot represent the Agency. (PWS Task 3.1.4, Laboratory Support Capabilities)

Contractor personnel performing radiochemical laboratory audits shall be familiar with Chapters 1, 2, 3, and 6 of the *Manual for the Certification of Laboratories Analyzing Drinking Water*, the radiochemistry drinking water methods and analytical requirements in 40 CFR 141.25 as well as Alternate Test Procedure radiochemistry methods approved by OGWDW for drinking water, and audit checklists and other information provided by EPA. If possible, Regional and/or State Certification Officers will accompany the third party expert during the on-site audit. The contractor shall coordinate with regional and/or state personnel and the laboratory to schedule time for each audit. Audits should be scheduled such that some audits can be grouped by location to assist in reducing travel costs. The contractor shall copy all correspondence to the WAM, including correspondence between the contractor and the Regional Certification Officer, and correspondence between the laboratory and the contractor should also be copied to the Regional Certification Officer.

Prior to the audit, as needed, the EPA WAM will hold a pre-audit teleconference with the Regional Certification Officer and the contractor to discuss scheduling the audit and to identify Regional preferences in conducting the audit. Prior to the scheduled audit, the contractor shall send a pre-audit checklist to the laboratory, allowing two weeks to respond. Example checklists can be found in Chapter 6 of the *Manual for the Certification of Laboratories Analyzing Drinking Water*. Prior to the audit, the contractor shall review the response for completeness and call the laboratory to address missing or unclear items. The items to be reviewed prior to the audit could include Laboratory Quality Assurance Plans, personnel listings, proficiency testing (PT) results, and other laboratory data as applicable. Audits should follow the protocols found in Appendix B of the *Manual for the Certification of Laboratories Analyzing Drinking Water*.

While on-site at the laboratory, the audit should include a brief opening meeting with laboratory personnel, and prior to leaving the laboratory, a closing meeting should be held to discuss with the laboratory any "findings" that will be discussed in the audit report.

The contractor shall provide a written summary of the results of each audit, using guidelines provided by EPA. A copy of the completed audit checklist shall accompany each report. The

report may include observations not included on the checklist. The report shall clearly identify "findings", or items found in the laboratory which conflict with drinking water regulations, including promulgated analytical methods and documents incorporated into regulation by reference, and "recommendations", or items identified that are not conflicting with drinking water regulations or promulgated analytical methods, but the addition of which would improve the analytical capabilities of the laboratory being audited. "Findings" and "recommendations" should be clearly referenced in the report to the appropriate section of the *Manual for the Certification of Laboratories Analyzing Drinking Water*, the appropriate section of the promulgated analytical method, or the section of the Code of Federal Regulations. The report may also identify "findings" where actual laboratory practices conflict with the laboratory's own Quality Assurance Manual and SOPs; these "findings" should be clearly referenced to the laboratory's Quality Assurance documents.

In addition, the report shall clearly identify the analytical methods for which the laboratory and/or Region has requested certification, and the certification status of each method shall be clearly identified. Drinking water certification statuses can be found in the *Manual for the Certification of Laboratories Analyzing Drinking Water*, in chapter 3, section 8. Reports shall be signed and dated by persons performing the audit. Reports shall be sent to the appropriate Certification Officer, as designated by the WAM, and to the WAM. Technical questions regarding the report shall be answered by the contractor with review and approval by the WAM; policy questions regarding the report shall be answered by the WAM.

<u>Deliverables</u>: **Draft and final lab evaluation reports and accompanying checklists. NOTE:** If less than two weeks remain in the Base Period, the deliverable shall be the completed checklist and a listing of analytical methods and certification status for each method.

### **Task 2: Radiochemistry Technical Support.**

The contractor will provide technical support regarding the use of radiochemistry methods, radiochemistry applications, and related health physics concerns in support of laboratory certification or preparedness. The contractor will maintain EPA's capacity to provide technical expertise by ensuring that the qualifications of assigned experts and technical response personnel meet the requirements of the *Manual for the Certification of Laboratories Analyzing Drinking Water* and current industry practices and standards. (PWS Task 3.1.4, Laboratory Support Capabilities)

The WAM will provide technical direction to initiate work under this task.

Deliverables will be determined by the WAM based on required response, and timing of such will be included on technical directives.

### V. SCHEDULE/DELIVERABLES

Deliverable	Schedule				
Work Plan	Within twenty days of work assignment				
	receipt				

Deliverable	Schedule
On-site laboratory audits	As scheduled by the EPA WAM
Draft Lab Evaluation Report and Checklist	2 weeks after audit of laboratory
Final Lab Evaluation Report and Checklist	1 week after receipt of comments from
_	WAM and CO if applicable.
Additional technical support	As directed by EPA WAM

# VI. REPORTING REQUIREMENTS

Monthly Progress Reports (including a progress evaluation discussion) Financial Reports Project Specific QAPP

#### VII. GREEN MEETINGS AND CONFERENCES

The contractor shall follow the provision of EPA prescription 1523.703-1, *Acquisition of environmentally preferable meeting and conference services (May 2007)*, for the use of off-site commercial facilities for an EPA event, whether the event is a meeting, conference, training session, or other purpose. Environmental preferability is defined at FAR 2.101, and shall be used when soliciting quotes or offers for meeting/conference services on behalf of the Agency.

#### VIII. Reference Materials

The following websites are provided to the contractor for materials referenced in this work assignment. If the contractor needs additional information or can not access the materials at the websites, the contractor should contact the WAM who can provide copies of documents, if necessary.

<u>Manual for Certification of Laboratories Analyzing Drinking Water</u>, Fifth Edition, January 2005: http://www.epa.gov/safewater/labindex.html

#### EPA Radionuclide methods:

http://www.epa.gov/safewater/methods/rads.html (a list of the approved methods and sources) and through NEMI:

http://www.nemi.gov/ (NEMI has many of the methods on-line as pdf documents)

# QUALITY ASSURANCE SURVEILLANCE PLAN for the Water Security Division's Technical, Analytical, and Regulatory Mission Support Performance Work Statement

# **Quality Assurance Surveillance Plan**

The requirements contained in this work assignment are considered performance-based, focusing on the Agency's desired results and outcomes. The contractor shall be responsible for determining the most effective means by which these requirements will be fulfilled. In order to fulfill the requirements, the contractor shall design innovative processes and systems that can deliver the required services in a manner that will best meet the Agency's performance objectives. This performance-based requirement represents a challenge to the contractor to develop and apply innovative and efficient approaches for achieving results and meeting or exceeding the performance objectives, measures, and standards described below. Contractor's performance will be reflected in the positive or negative evaluation offered by the Agency in the Contractor Performance Evaluation (CPE) which is evaluated annually (per the "Contractor Performance Evaluation" clause in the contract). The Work Assignment Manager shall submit a complete annual review of the areas outlined in the Quality Assurance Surveillance Plan (QASP), included in the contract, which will then be utilized by the Project Officer in preparing the overall evaluations submitted annually in response to the Contractor Performance Evaluation requirements in the contract.

General Management and Administration											
Performance Requirement	Measurable Performance Standards	Surveillance Methods	Incentives/Disincentives								
Management and Communications: The Contractor shall maintain contact with the EPA CO, PO and WAM throughout the performance of the contract and shall immediately bring potential problems to the attention of the appropriate EPA WAM. In cases where issues have a direct impact on project schedules or cost, the contractor shall provide options for EPA's consideration on resolving or mitigating the impacts.	Any issues that impact project schedules or cost shall be brought to the attention of the appropriate EPA WAM within 3 business days of occurrence.	100% of active work assignments under the contract will be reviewed by the EPA WAM monthly (via monthly progress report) to identify unreported issues. The EPA WAM will report any issues to the EPA PO who will bring the issue(s) to the Contractor's attention through the CO.	Unsatisfactory rating under the category of Business Relations in the NIH Performance Evaluation System if two or more incidents occur during an applicable period of performance when the contractor does not meet the measurable performance standards for a given contract period.								

Timeliness: Services and deliverables shall be in accordance with schedules stated in each work assignment or tasking document, unless amended or modified by an approved EPA action.

During any period of performance, 90% of all submitted deliverables shall be submitted no later than 5 business days past the due date. 100% of active work assignments under the contract will be reviewed by the EPA WAM monthly (via monthly progress report & milestones established for each deliverable) to compare actual delivery dates against those approved. The EPA WAM will report any issues to the EPA PO who will bring the issue(s) to the Contractor's attention through the CO.

Unsatisfactory rating under the category of Timeliness in the NIH Performance Evaluation System when the contractor does not meet the measurable performance standards during an applicable period of performance.

Cost Management and Control: The Contractor

shall monitor, track and accurately report level of effort, labor cost, other direct cost and fee expenditures to EPA through progress reports and approved special reporting requirements.

The Contractor shall assign appropriately leveled and skilled personnel to all tasks, practice and encourage time management, and ensure accurate and appropriate time keeping.

The contractor shall manage costs to the level of approved ceiling on the work assignment. The contractor shall notify the WAM/PO when 75% of the approved funding ceiling for the work assignment is reached.

The EPA PO will routinely meet with the Contractor's Project Manager to discuss the work progress and contract and individual work assignment expenditures. The EPA PO shall review the Contractor's monthly progress reports and request the WAMs verification of expenditures and technical progress before authorizing invoice payments.

Unsatisfactory rating under the category of Cost Control in the NIH Performance Evaluation System when the contractor does not meet the measurable performance standards during an applicable period of performance.

Technical Effort: The analyses or products developed by the contractor shall be factual and defensible and based on sound science and engineering. All data shall be collected from reputable sources and quality assurance measures shall be conducted in accordance with contract, agency requirements and any additional requirements outlined in individual work assignments or technical directives. Any work requiring the contractor to provide options or recommendations shall include the rationale used in selecting the option/recommendation and all other options and recommendations considered.

All analyses conducted for EPA by the Contractor must be factual and based on sound science and engineering. All analyses and products (initial and final drafts) shall conform in format and content to requirements specified by the WAM in written technical direction, and should meet the objectives stated in the work assignment. All initial draft documents shall be clearly written at a level appropriate to the targeted audience. All information shall be factual, technically sound, and accurate, with data sources identified.

Draft versions of a document shall require no more than two editorial revisions.

EPA will review all analyses and work products conducted by the Contractor and will independently consider the merit. EPA may opt to peer review analyses to further validate merit.

The EPA WAM/TM (Task Manager) will review initial drafts to assess technical accuracy and editorial quality. The WAM/TM will identify all inaccuracies and needed edits and corrections to the contractor in the initial review of draft documents.

Unsatisfactory rating under the category of QUALITY OF PRODUCT OR SERVICE in the NIH Performance Evaluation System when the contractor does not meet the measurable performance standards during an applicable period of performance, even after review input and follow up discussion by Agency personnel.

# Socio-Economic

Utilization: The
Contractor shall assess all
agency requirements
outlined in work
assignments for
opportunities to fully utilize
the knowledge and
experience of its socioeconomic team members.
Work shall be allocated in
a manner that ensures the
Contractor's annual
subcontracting goals are
met.

The Contractor shall meet a standard of at least 80% of the dollar goals outlined in their subcontracting plan during each period of performance, unless Agency priorities prevent or preclude such tasking. EPA will monitor the contractor's utilization of socio-economic firms by reviewing the contractor's submittal of Standard Forms (SF) 294 and (SF) 295.

If less than 80% is reached during an applicable period of performance, the contractor shall outline the steps that will be taken to meet the annual goals outlined in their plan, or provide justification as to the rationale for the lack of meeting the subcontracting plan goals. Performance that does not meet the stated goals without sufficient justification will be reported as an **Unsatisfactory** rating under the category of BUSINESS RELATIONS, and MEETING SDB SUBCONTRACTING **REOUIREMENTS** in the **NIH Performance** Evaluation System.

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